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AT&T

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295 North Maple Avenue
Basking Ridge, NJ 07920

December 16, 1992

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DEC 16 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

Re: Ex Parte Presentation
CC Dockets 91-141 and 92-222

Dear Ms. Searcy:

On December 16, 1992, Paul Malandrakis and I met with Douglas Slotten, Linda Haller and David Sieradzki of the Common Carrier Bureau. At this meeting, we discussed several issues related to the above referenced proceedings and indicated AT&T's opposition to NYNEX's Emergency Petition for Waiver that would permit premature reallocations of GSF expense and deaveraged pricing.

Two copies of this Notice were submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely yours,

Richard N. Clarke
Regulatory Policy Analysis
Government Affairs

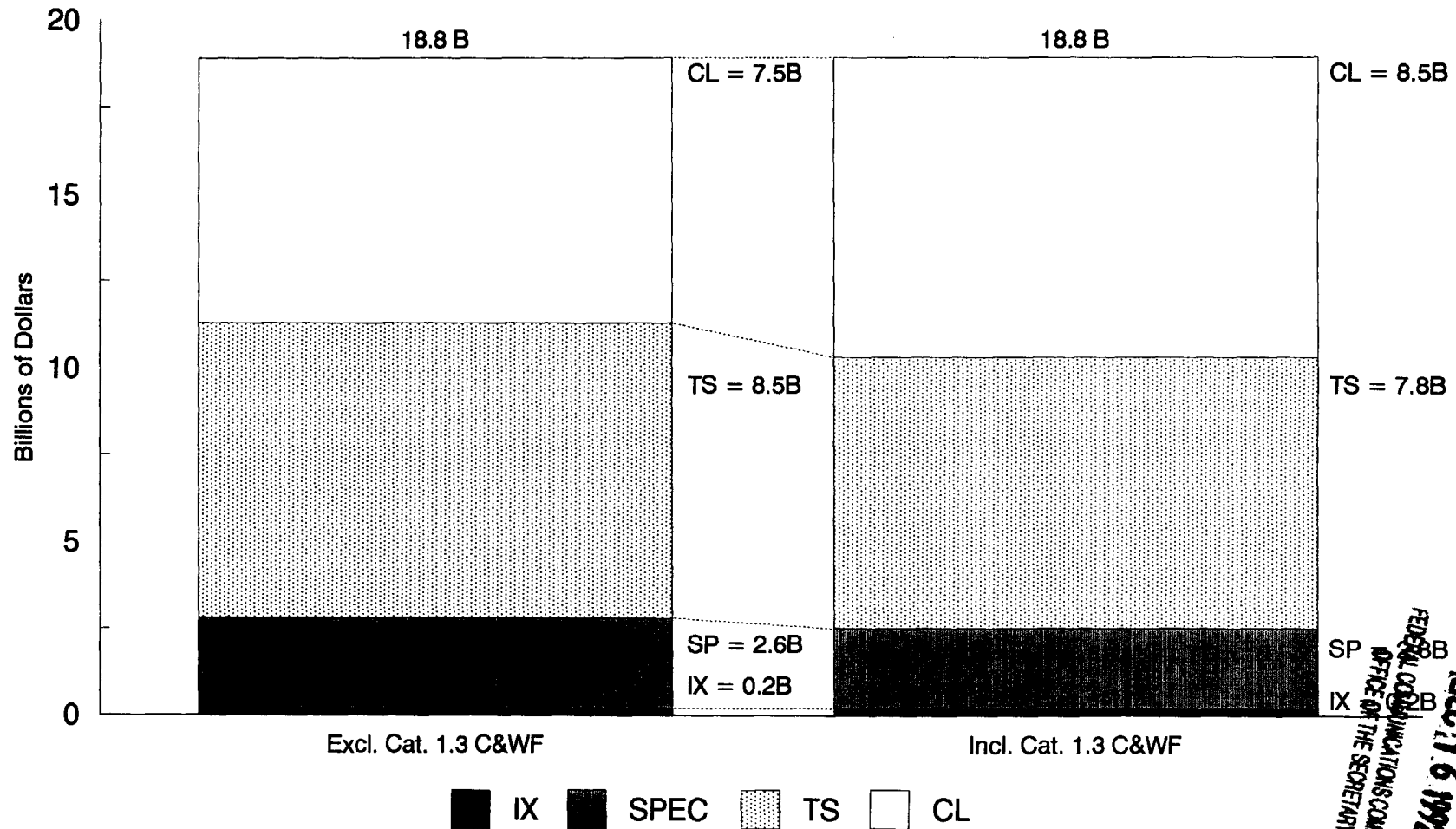
Attachments

cc: D. Slotten
L. Haller
D. Sieradzki

Handwritten initials "OT/1" and a circular stamp with the letter "E" inside.

ESTIMATED ACCESS CATEGORY COSTS

Resulting From Proposed Modification
of Part 69.307 GSF Allocations



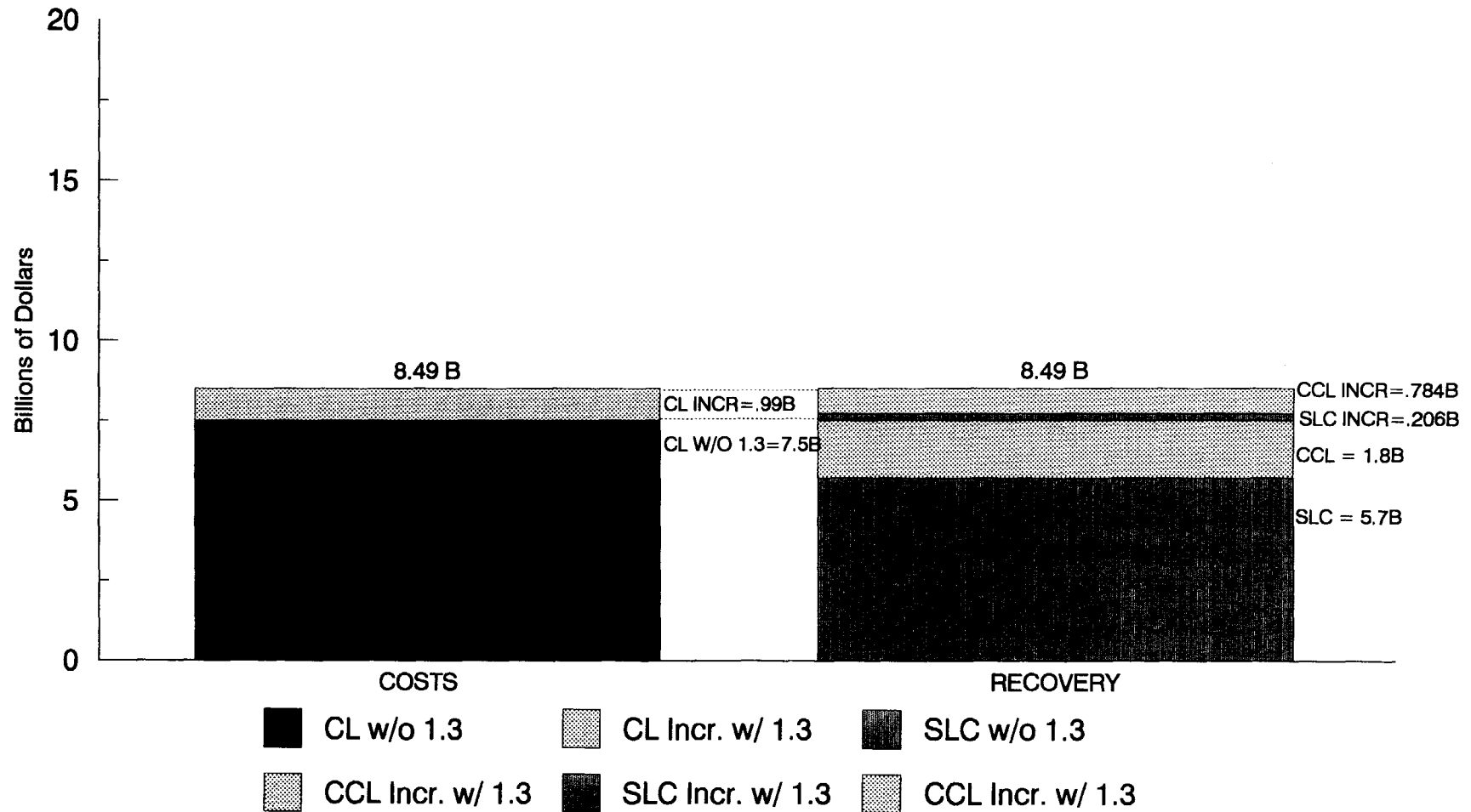
Note: Based on 1991 ARMIS Data
(Tier 1 LECs Excluding Puerto Rico)

KALBERT FLPAT1.DRW

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ESTIMATED CL COST RECOVERY

Resulting From Proposed Modification
of Part 69.307 GSF Allocations

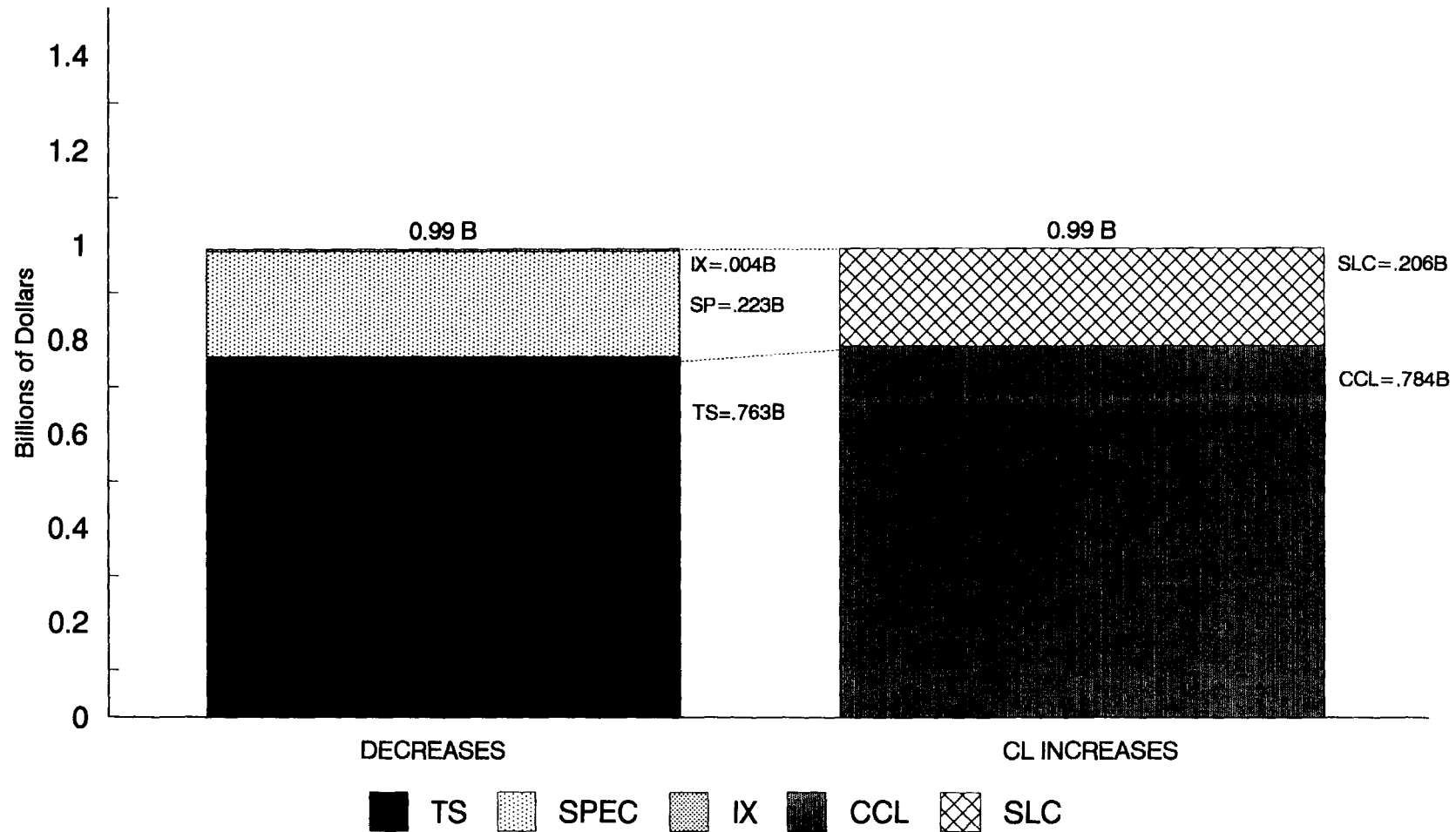


Note: Based on 1991 ARMIS Data
(Tier 1 LECs Excluding Puerto Rico)

KALBERT FLPAT2.DRW

ESTIMATED GSF EXPENSE RE-ALLOCATION

Resulting From Proposed Modification
of Part 69.307

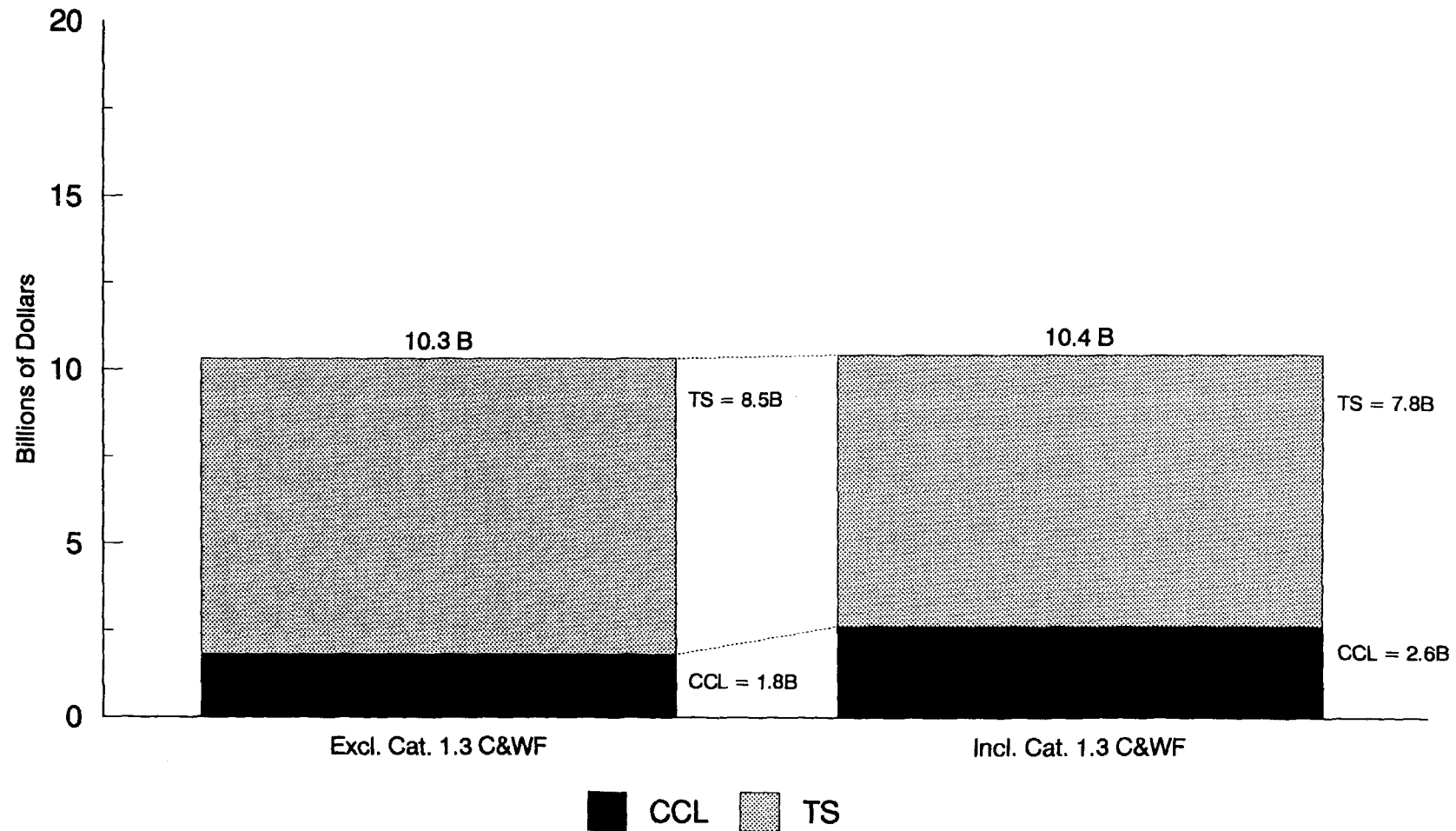


Note: Based on 1991 ARMIS Data
(Tier 1 LECs Excluding Puerto Rico)

KALBERT FLPAT3.DRW

EFFECTS ON SWITCHED ACCESS RATES

Resulting From Proposed Modification
of Part 69.307 GSF Allocations

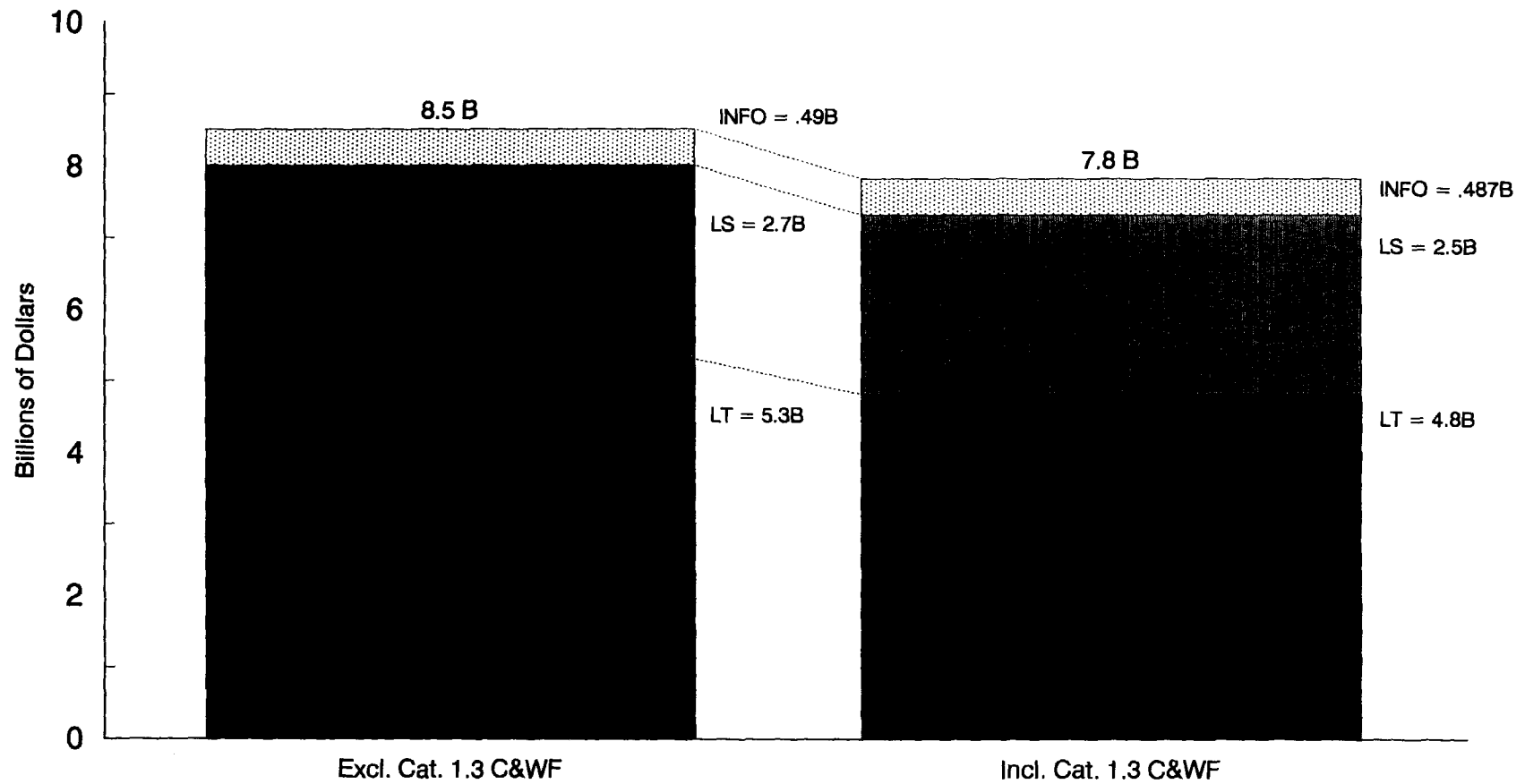


Note: Based on 1991 ARMIS Data
(Tier 1 LECs Excluding Puerto Rico)

ALBERT FLPAT4.DRW

ESTIMATED EFFECT ON TS ACCESS CATEGORIES

Resulting From Proposed Modification
of Part 69.307 GSF Allocations



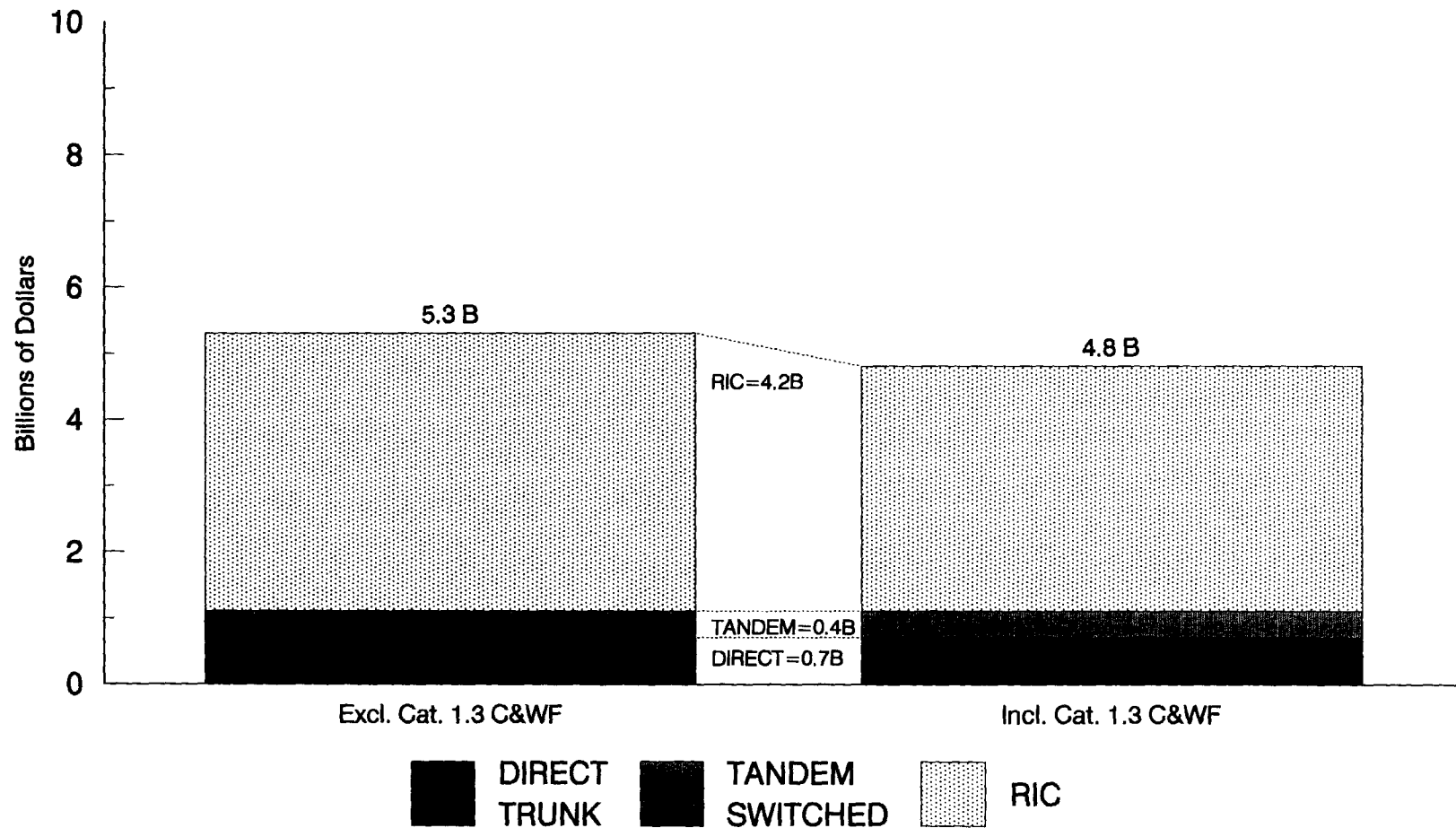
■ LT ■ LS ■ INFO

Note: Based on 1991 ARMIS Data
(Tier 1 LECs Excluding Puerto Rico)

KALBERT.FLPATS.DRW

ESTIMATED EFFECTS ON LT ACCESS CATEGORIES

Resulting From Proposed Modification
of Part 69.307 GSF Allocations



Note: Based on 1991 Tier 1 ARMIS Data, Excl. PR
LT Breakdown estimated to be 80% RIC, 13% Direct
Trunked, and 7% Tandem Switched.

NYNEX:
EMERGENCY PETITION FOR WAIVER
(CC Docket 91-141)

Requests:

- Reallocation of GSF from Special to Common Line
- Deaveraged special access pricing

It is premature to grant these requests:

- No emergency exists
- Must address these issues comprehensively
- Must ensure appropriate, revenue-neutral transfers